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PARENT AND CHILD — WHETHER MARRIAGE OF INFANT EMANCIPATES HIM. — Two minors above the age of consent married. The wife obtained a divorce and a decree for temporary alimony. The defendant had no property, and his father received his wages and services. *Held*, that he is not in contempt for failure to pay the alimony. *Austin v. Austin*, 132 N. W. 495 (Mich.).

By the great weight of authority the lawful marriage of an infant, whether with or without the parent's consent, entitles the infant to his earnings for the support of his family. *Commonwealth v. Graham*, 157 Mass. 73, 31 N. E. 706; *Aldrich v. Bennett*, 63 N. H. 415. *Contra*, *White v. Henry*, 24 Me. 531. The highest considerations of public policy demand that this be so. In allowing infants to contract a new relationship, the obligations of which are inconsistent with those of a child toward its parent, the law should sever the latter so that the infant wife may enjoy the companionship and protection of her husband, and the infant husband may apply his earnings to the maintenance of his new family. The principal case, decided on the ground that marriage alone does not emancipate a male minor, would therefore seem to be opposed to authority and wrong on principle. However, it follows the established rule of its jurisdiction. *People v. Todd*, 61 Mich. 234, 28 N. W. 79.

PRESCRIPTION — PROFIT À PRENDRE — ACQUIREMENT BY THE PUBLIC OF RIGHT OF FISHING IN PRIVATE WATERS — ACQUIREMENT BY FREEHOLD INHABITANTS OF RIGHT OF FISHING IN PRIVATE WATERS. — The plaintiff claimed the exclusive right of fishing in a large navigable but non-tidal lake, through grants by the Crown in 1605 and certain evidence of possession at various times thereafter. The public had for centuries openly, as of right, and without interruption, fished in the lake. *Held*, that the plaintiff is entitled to an injunction restraining one of the public from fishing. *Johnston v. O'Neill*, [1911] A. C. 552.

Riparian proprietors along a navigable but non-tidal river claimed the exclusive right of fishing therein. Freeholders in certain parishes along the river had for centuries, openly, continuously, and as of right, fished in the river for commercial purposes. *Held*, that the riparian proprietors have the exclusive right claimed. *Harris v. Earl of Chesterfield*, [1911] A. C. 623. See NOTES, p. 280.

PUBLIC SERVICE COMPANIES — RIGHTS AND DUTIES — DISCRIMINATION IN RAILROAD RATES FOR SUBURBAN SERVICE. — An electric railway company for seven years maintained exceptionally low rates, which resulted in the growth of a large suburban population composed of those employed in neighboring cities. Thereafter a general advance in rates made it impossible for most of these people to afford the daily trip and they were moving back to the cities in large numbers. On a complaint made against the advance, the state railroad commission ordered the restoration of the old rates within a ten-mile zone. These rates were shown to be unremunerative beyond covering the cost of the service, but it appeared that through the advanced rates allowed to remain upon the balance of the company's traffic, it was able to earn a profit of seven per cent upon its total capitalization. The company appealed from the order of the commission. *Held*, that the order be sustained. *Puget Sound Electric Ry. v. Railroad Commission*, 117 Pac. 739 (Wash.). See NOTES, p. 276.

RECEIVERS — ANCILLARY APPOINTMENT OF RECEIVERS IN FEDERAL COURTS. — Receivers were properly appointed for a company in the Federal Circuit Court of Delaware. They filed an *ex parte* bill, which was granted, in an Illinois Circuit Court to confirm their previous appointment, and, as ancillary to that appointment, appoint them receivers in that district. The bill prayed